

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

YORON COHEN,

Plaintiff,

v.

JONES LANG LASALLE AMERICAS,
INC., PETER RIGUARDI,
and STEPHEN SCHLEGEL,

Defendants.

No. 17-CV-03471

**DECLARATION OF RYAN J.
STONEROCK IN SUPPORT OF
PLAINTIFF'S MOTION FOR ISSUANCE
OF REQUEST FOR INTERNATIONAL
JUDICIAL ASSISTANCE TO OBTAIN
EVIDENCE IN THE UNITED KINGDOM
(LETTERS ROGATORY)**

Ryan J. Stonerock declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner at the law firm of Harder Mirell & Abrams LLP, counsel of record for plaintiff Yoron Cohen ("Plaintiff" or "Mr. Cohen"). I am over 18 years of age and am competent to testify. The statements contained in this declaration are based on my personal knowledge and, to the best of my knowledge, are true and accurate.

2. Attached hereto as **Exhibit A** is a true and correct copy of the relevant excerpts of Plaintiff's Initial Disclosures, served in this action on October 10, 2017.

3. Attached hereto as **Exhibit B** is a true and correct copy of the relevant excerpts of defendants Jones Lang LaSalle Americas, Inc.'s ("JLL"), Peter Riguardi's, and Stephen Schlegel's (collectively, "Defendants") Initial Disclosures, served in this action on October 10, 2017.

4. Attached hereto as **Exhibit C** is a true and correct copy of relevant excerpts of JLL's Responses to Plaintiff's First Set of Interrogatories, served in this action on November 17, 2017.

5. Attached hereto as **Exhibit D** is a true and correct copy of a preservation of a December 18, 2016 JLL News Release entitled, "JLL Taps Gavin Morgan to Oversee Capital Markets Group in New York," located at <http://www.us.jll.com/united-states/en-us/news/3793/jll-taps-gavin-morgan-to-oversee-capital-markets-group-in-ny>, as it appeared on JLL's website on December 14, 2017.

6. Attached hereto as **Exhibit E** is a true and correct copy of a preservation of a January 6, 2017 article entitled, "Inside the exodus of JLL's I-sales quartet," located at <https://therealdeal.com/2017/01/06/inside-the-exodus-of-jlls-i-sales-quartet/>, as it appeared on The Real Deal's website on September 7, 2017.

7. Following my receipt of Defendants' Initial Disclosures (**Exhibit B** hereto), I contacted Defendants' counsel regarding making Gavin Morgan available for deposition since the Initial Disclosures stated that Mr. Morgan "may be contacted only through Defendants' counsel." Defendants' counsel has since advised that this statement was made in error and they do not represent Mr. Morgan.

8. On January 3, 2018, I emailed a copy of Plaintiff's Motion, Memorandum of Law and Request for International Judicial Assistance to Defendants' counsel, and asked whether Defendants would oppose the requested relief. In response, Defendants informed Plaintiff that they will not consent to the Motion.

Executed January 5, 2017 at Beverly Hills, California

/s/ Ryan J. Stonerock

Ryan J. Stonerock